RM-10811 is well presented. I would point out that the Amateur Radio service exists as a back-up emergency communications service and , as such, should retain the very basic mode for emergency communication, namely, Morse Code.

The 5 word-per-minute element 1 is very reasonable for the General class license as is the 12 word- per- minute proposal for the Extra class license. I support the FISTS CW Club proposals in RM-10811.

Morse code has proven itself over many decades to be a reliable, economic and spectrum efficient mode of communications in emergencies.

Thank you for your time and consideration.

Respectfully submitted,

William R. Phillipson, W6PRI